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August 15, 2019

Certified Mail  
Return Receipt Requested  
7018 0360 0000 6624 6852

John Pavitt  
Air Compliance Inspector  
Alaska Operations Office  
222 W. 7<sup>th</sup> Avenue, Box 19  
Anchorage, AK 99513-7588  
Pavitt.John@epa.gov

RE: Records Request, EPA Air Compliance Inspection of ConocoPhillips, Kuparuk, CPF#1

Dear Mr. Pavitt,

Enclosed please find a submittal of the documentation requested by the Environmental Protection Agency (EPA) by email on August 2, 2019 as part of the joint EPA/State of Alaska air compliance inspection on July 18, 2019 of the CPF#1 facility which focused on compliance with New Source Performance Standard (NSPS) Subpart OOOOa.

1. *Please send me records of leak inspections at 1E and 1Q Pads:*
  - a. *For new leaks identified during the inspection, confirm that the leaking components have been added to your tracking system and are on a schedule for repair.*

The leaks identified during the inspection have been repaired. Please see Attachment 1 for the records showings the leaking components have been added to our tracking system and repaired.

- i. *Verify that the leaking components have been either tagged or documented with a digital photo showing the GPS coordinates.*

The leaking components were tagged when found on July 18, 2019. Please see Attachment 1 for the assigned tag numbers and copies of the tags removed when the components were resurveyed.

- b. *For leaks placed on Delay of Repair in the Annual Compliance Report (June, 2018), please provide:*
        - i. *Daily inspection logs such as paper checklists used by your leak inspectors when the leaks were identified*
        - ii. *Photos and/or video of leaking components, showing GPS coordinates*
        - iii. *Photos of tags put onto leaking components*

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- iii. *Photos of tags put onto leaking components*
- iv. *Work orders related to repairing leaks*
- v. *Follow up inspection records for all leaking components which have been repaired or replaced, and then resurveyed to verify they were no longer leaking.*

The records of the leaks placed on Delay of Repair in the Annual Compliance Report submitted June 2018 are provided in Attachments 2 – 21 as outlined below.

Attachment	Leak Tag(s)
2	DS1D-0000a-2018-0221
3	DS1H-0000a-2017-0044 DS1H-0000a-2017-0072 DS1H-0000a-2017-0073 DS1H-0000a-2017-0074 DS1H-0000a-2017-0082
4	DS1L-0000a-2017-0020
5	DS1L-0000a-2017-0359
6	DS2A-0000a-2017-0009 DS2A-0000a-2017-0011
7	DS2B-0000a-2017-0055 DS2B-0000a-2017-0056 DS2B-0000a-2017-0057 DS2B-0000a-2017-0058 DS2B-0000a-2017-0060 DS2B-0000a-2017-0061 DS2B-0000a-2017-0075
8	DS2K-0000a-2017-0053
9	DS2M-0000a-2017-0085
10	DS2T-0000a-2017-0086 DS2T-0000a-2017-0087
11	DS2T-0000a-2017-0318
12	DS2X-0000a-2017-0088 DS2X-0000a-2017-0089 DS2X-0000a-2017-0090 DS2X-0000a-2017-0095
13	DS2X-0000a-2017-0381 DS2X-0000a-2017-0382
14	DS2Z-0000a-2017-0001
15	DS2Z-0000a-2017-0346 DS2Z-0000a-2017-0379
16	DS3G-0000a-2017-0259 DS3G-0000a-2017-0345
17	DS3G-0000a-2017-0383

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Attachment	Leak Tag(s)
18	DS3H-OOOOa-2017-0353
19	DS3N-OOOOa-2017-0078 DS3N-OOOOa-2017-0079 DS3N-OOOOa-2017-0096 DS3N-OOOOa-2017-0097 DS3N-OOOOa-2017-0098 DS3N-OOOOa-2017-0099 DS3N-OOOOa-2017-0100 DS3N-OOOOa-2017-OGI-01
20	DS3Q-OOOOa-2017-0076
21	DS3R-OOOOa-2017-0002

- c. *In the 2018 Annual Report, the report states that components were designated as Unsafe-to-Monitor at Well Sites No. 3 and 12. Please provide the reasons that these sites were unsafe and a schedule of when you anticipate monitoring them for leaks.*

In the Annual Compliance Report submitted in June 2019, components at Well Sites No. 3 and 12 were designated as Unsafe-to-Monitor because the components were buried under snow at the time of the survey in Winter 2018. The Unsafe-to-Monitor components at Well Site No. 3 (Drill Site 1D) were monitored on June 22, 2018. The Unsafe-to-Monitor components at Well Site No. 12 (Drill Site 2G) were monitored on August 8, 2018.

Should you have any questions regarding this submittal, please contact the Kuparuk Environmental Coordinator at (907) 659-7242.

Sincerely,



Brad Broker/Catie Coursen  
Environmental Coordinator

Enclosures